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January 13, 2020

VIA ECF AND FAX

The Hon. P. Kevin Castel
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

RE: SEC v. Telegram, et al., No. 19-cv-9439(PKC) (S.D.N.Y.)

Dear Judge Castel:

As discussed earlier today with Your Honor's Law Clerk, we write with the consent of Plaintiff to jointly request permission to follow the below procedures with respect to the parties' motions for summary judgment and Plaintiff's motion to strike, which are due today.

Because these filings are expected to contain confidential and/or sensitive information for which one or both parties may request sealing, the parties propose that they exchange unredacted versions of their filings today, work to address any confidentiality concerns implicated, and then file redacted versions on the Court's public docket by Wednesday, January 15, following such efforts. Any party seeking to have documents remain redacted or under seal may thereafter make a request for such treatment.

Thank you for your attention to this matter, and the parties remain available to discuss.

Respectfully submitted,



Alexander C. Drylewski

cc: All counsel of record (via ECF)